Sage Legal LLC

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June 12, 2024

<u>VIA ECF</u>
United States District Court
Eastern District of New York
<u>Attn</u>: Hon. Cheryl L. Pollak, U.S.M.J.
225 Cadman Plaza East
Courtroom 13B South
Brooklyn, NY 11201-1804

> *Re:*   **Ortega v. Champagne Room BK, Inc.,** *et al.*
> **<u>Case No.: 1:21-cv-1125 (NGG) (CLP)</u>**

Dear Judge Pollak:

This office represents the Plaintiff Iluminada Ortega (hereinafter the "Plaintiff") in the above referenced case.   Plaintiff writes to respectfully request an extension of time of thirty (30) days to comply with this Court's Order dated April 30, 2024.

Your undersigned has been mired in preparation for and conducting of hearings before the New York State Industrial Board of Appeals ("NYSIBA") and the Hon. Pamela K. Chen, U.S.D.J. ("Judge Chen"), for which hearings took place on May 6, 2024 and May 29, 2024, respectively, with continued hearing dates on June 14, 2024 before NYSIBA and June 17, 2024 before Judge Chen,[1] respectively, among deadlines and appearances in other matters. Based on the foregoing, additional time is necessary to comply with the April 30, 2024 Order.

Plaintiff respectfully submits that sufficient good cause and excusable neglect exists to warrant this Court's exercise of discretion in favor of granting the requested extension of time. <u>See</u> Fed. R. Civ. P. 6(b)(1)(B).   Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
      June 12, 2024

Respectfully submitted,
SAGE LEGAL LLC
<u>/s/ Emanuel Kataev, Esq.</u>
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Attorneys for Plaintiff
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[1] Your undersigned conducted a deposition pursuant to Rule 32 of the Federal Rules of Civil Procedure yesterday in preparation for the June 17, 2024 continued hearing before Judge Chen.

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